REMARKS

I. <u>Introduction</u>

Claims 14 to 27 are pending in the present application. In view of the foregoing amendments and the following remarks, it is respectfully submitted that all of the presently pending claims are allowable, and reconsideration is respectfully requested.

Applicants note with appreciation the acknowledgment of the claim for foreign priority and the acknowledgment that all certified copies of the priority documents have been received.

II. Rejection of Claims 14 to 23 and 26 Under 35 U.S.C. § 102(b)

Claims 14 to 23 and 26 were rejected under 35 U.S.C. § 102(b) as anticipated by U.S. Patent No. 6,425,468 ("Yamamoto et al."). It is respectfully submitted that Yamamoto et al. does not anticipate the present claims for at least the following reasons.

Claim 14 relates to a system, including the features of drive units arranged on a movable part, each drive unit powered in a contactless manner by an inductive coupling to at least one primary conductor, in which the at least one primary conductor and the drive units are fixed relative to each other on the movable part. Support for the amendments to claim 14 may be found in the specification, e.g., at page 10, lines 14 to 31; and Figures 4 to 5g.

Yamamoto et al. does not disclose, or even suggest, all of the features included in claim 14. In contrast, Yamamoto et al. merely describes a feeder line 5 fixed on a guide rail 1, and a carrier vehicle having a pickup portion 24, in which the carrier vehicle moves relative to the guide rail. Col. 5, lines 41 to 55; and Figures 6 to 9C. Accordingly, Yamamoto et al. merely describes a pickup portion 24 that moves relative to a feeder line 5. However, nowhere does Yamamoto et al. disclose that its feeder line and pickup portion are fixed relative to each other on the carrier vehicle. Thus, Yamamoto et al. does not disclose, or even suggest, the features that at least one primary conductor and drive units are fixed relative to each other on a movable part.

It is, of course, "well settled that the burden of establishing a <u>prima</u> <u>facie</u> case of anticipation resides with the [United States] Patent and Trademark Office." Ex parte Skinner, 2 U.S.P.Q.2d 1788, 1788 to 1789 (Bd. Pat. App. & Inter.

1986). To anticipate a claim, each and every element as set forth in the claim must be found in a single prior art reference. Verdegaal Bros. v. Union Oil Co. of Calif., 814 F.2d 628, 631, 2 U.S.P.Q.2d 1051, 1053 (Fed. Cir. 1987). Furthermore, "[t]he identical invention must be shown in as complete detail as is contained in the . . . claim." Richardson v. Suzuki Motor Co., 868 F.2d 1226, 1236, 9 U.S.P.Q.2d 1913, 1920 (Fed. Cir. 1989). That is, the prior art must describe the elements arranged as required by the claims. In re Bond, 910 F.2d 831, 15 U.S.P.Q.2d 1566 (Fed. Cir. 1990). In other words, to be anticipatory, a single prior art reference must show all of the limitations of the claims arranged or combined in the same way as recited in the claims. Net Moneyin, Inc. v. Verisign, Inc., 545 F.3d 1359 (Fed. Cir. 2008). As more fully set forth above, Yamamoto et al. does not disclose, or even suggest, all of the features included in claim 14. As such, it is respectfully submitted that Yamamoto et al. does not anticipate claim 14.

As for claims 15 to 23 and 26, which depend from claim 14 and therefore include all of the features included in claim 14, it is respectfully submitted that Yamamoto et al. does not anticipate these dependent claims for at least the same reasons more fully set forth above.

In view of all the foregoing, withdrawal of this rejection is respectfully requested.

III. Rejection of Claims 14 and 27 Under 35 U.S.C. § 102(b)

Claims 14 and 27 were rejected under 35 U.S.C. § 102(b) as anticipated by UK Patent Application No. GB 2 100 069 ("Hill et al."). It is respectfully submitted that Hill et al. does not anticipate the present claims for at least the following reasons.

Hill et al. does not disclose, or even suggest, all of the features included in claim 14. In contrast, Hill et al. repeatedly states that "the primary and the secondary windings thereof [are] movable relative to each other." Page 1, lines 21 to 22, 32 to 33, and 74 to 76; and Figures 1 to 3. Accordingly, Hill et al. merely describes secondary windings that move relative to primary windings. However, nowhere does Hill et al. disclose that its primary windings and secondary windings are fixed relative to each other on a movable device. Thus, Hill et al. does not disclose, or even suggest, the features that at least one primary conductor and drive units are fixed relative to each other on a movable part.

Accordingly, Hill et al. does not disclose, or even suggest, all of the features included in claim 14. As such, it is respectfully submitted that Hill et al. does not anticipate claim 14.

As for claim 27, which depends from claim 14 and therefore includes all of the features included in claim 14, it is respectfully submitted that Hill et al. does not anticipate this dependent claim for at least the same reasons more fully set forth above.

In view of all the foregoing, withdrawal of this rejection is respectfully requested.

IV. Rejection of Claims 24 and 25 Under 35 U.S.C. § 103(a)

Claims 24 and 25 were rejected under 35 U.S.C. § 103(a) as unpatentable over Yamamoto et al. It is respectfully submitted that Yamamoto et al. does not render unpatentable the present claims for at least the following reasons.

Claims 24 and 25 depend from claim 14. As more fully set forth above, Yamamoto et al. does not disclose, or even suggest, all of the features included in claim 14, from which claims 24 and 25 depend. As such, it is respectfully submitted that Yamamoto et al. does not render unpatentable claims 24 and 25, which depend from claim 14.

In view of all of the foregoing, withdrawal of this rejection is respectfully requested.

V. <u>Conclusion</u>

It is therefore respectfully submitted that all of the presently pending claims are allowable. All issues raised by the Examiner having been addressed, an early and favorable action on the merits is earnestly solicited.

Respectfully submitted,

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